

McDONALD LAMOND CANZONERI
ATTORNEYS AT LAW

352 Turnpike Road, Suite 310
Southborough, MA 01772-1756
www.masslaborlawyers.com

Alan J. McDonald
James F. Lamond*
Jack J. Canzoneri
Olinda R. Marshall
Jason R. Powalisz
Dennis M. Coyne**
Kristen A. Barnes**
John O. Killian
Allison J. Zimmon

Tel: 508-485-6600
617-928-0080

Fax: 508-485-4477
617-928-0081

Of Counsel
Martin Kantrovitz
Michael Kantrovitz

In Memoriam
Vida K. Berkowitz
(1994-2005)

*Also Licensed in New Hampshire

**Also Licensed in New York

March 14, 2018

VIA EMAIL AND NLRB E-FILING

Robert A. Giannasi
Chief Administrative Law Judge
National Labor Relations Board
1015 Half Street SE
Washington, D.C. 20570-0001

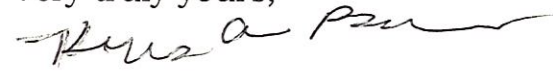
Re: United Government Security Officers of America International
and its Local 129
and Joseph Anthony Farrell and David Wehrer
NLRB Consolidated Case Nos. 04-CB-207347; 04-CB-208578;
and 04-CB-192246

Dear Judge Giannasi:

On behalf of the United Government Security Officers of America International and its Local 129, enclosed please find for filing a Motion to Extend Time To Respond To Subpoena Duces Tecum in the above-referenced matter.

Thank you for your attention to this matter.

Very truly yours,



Kristen A. Barnes

KAB/sh
Enclosure

MCDONALD LAMOND CANZONERI

Robert A. Giannasi
Chief Administrative Law Judge
National Labor Relations Board
March 14, 2018
Page 2 of 2

cc: Patrice Tisdale, Esq. (By Email)
Alan J. McDonald, Esq. (By Email)
Joseph Farrell (By Email)
David Wehrer (By Email)
Desiree Sullivan, UGSOA (By Email)

UNITED STATES OF AMERICA BEFORE
THE NATIONAL LABOR RELATIONS BOARD
REGION FOUR

In the matter of

United Government Security Officers
of America International and its Local
129,

and

Joseph Anthony Farrell and
David Wehrer, individuals

Case No. 04-CB-192246
04-CB-208578
04-CB-207347

**RESPONDENT UNIONS' MOTION TO EXTEND TIME
TO RESPOND TO SUBPOENA DUCES TECUM**

United Government Security Officers Of America International (Union)
and its Local 129 (Local) (collectively referred to herein as Respondent Unions),
request that the time for a response to the General Counsel's subpoena duces
tecum be extended for one (1) week from March 19, 2018 to March 26, 2018.

Respondent Unions require additional time to search for and review
documents responsive to the subpoenas due to the two Nor'easters which have
impacted Massachusetts following hearing in this matter. These storms both
resulted in widespread power outages which impacted the Union's office.

Respectfully submitted,

On behalf of the United Government
Security Officers of America International
and its Local 129,

By its attorneys,

/s/ Alan J. McDonald
Alan J. McDonald

McDonald Lamond Canzoneri
352 Turnpike Road, Suite 310
Southborough, MA 01772-1756
508-485-6600
amcdonald@masslaborlawyers.com

Date: March 14, 2018

CERTIFICATE OF SERVICE

I, Alan J. McDonald, hereby certify that I have on this day served a copy of the foregoing Respondent Unions' Motion to Extend Time To Respond To Subpoena Duces Tecum upon Patricia Tisdale, Esq., [Patrice.Tisdale@nrlrb.gov] Field Attorney, NLRB Region 4, 615 Chestnut Street, Philadelphia, PA, 19106, Joseph Farrell [daytonajoe Farrell@gmail.com], and David Wehrer [kdswehrer@verizon.net] by email.

Dated: March 14, 2018

/s/ Alan J. McDonald
Alan J. McDonald